

EXHIBIT C

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE

JANE C. FORRESTER WINNE, SARAH)
N. COFFEY, VICKIE L. MCMULLEN,)
KARIN A. HILLS, on behalf of herself and)
all others similarly situated,)

Plaintiffs,)

v.)

NATIONAL COLLEGIATE STUDENT)
LOAN TRUST 2005-1, et al.,)

Defendants.)

Civil Action Docket No:
1:16-cv-00229-JDL

AFFIDAVIT OF ERIC A. W. DANNER

STATE OF Quebec)

)

COUNTY OF Canada)

NOW BEFORE ME, the undersigned authority, personally came and appeared Eric A.
W. Danner who, after being duly sworn, did depose and state:

1. I am over eighteen years of age and am competent and authorized to make the following declaration based on my experience with the *Plan Trust Agreement of The Education Resources Institute, Inc.* (the "TERI Plan Trust") entered into pursuant to the *Fourth Amended Joint Plan of Reorganization of The Education Resources Institutc, Inc.* ("TERI"), which Plan was confirmed by the United States Bankruptcy Court for the District of Massachusetts (the "Bankruptcy Court") on October 29, 2010. The Plan established TERI Plan Trust and thereafter TERI Loan Holdings, LLC ("TERI Loan

Holdings”) was created as a wholly-owned subsidiary of TERI Plan Trust, to take title to TERI’s defaulted student loan portfolio.

2. TERI Loan Holdings holds certain defaulted student loans which TERI purchased from various entities, including, but not limited to, National Collegiate Student Loan Trust 2005-1, National Collegiate Student Loan Trust 2005-3, National Collegiate Student Loan Trust 2006-3, and National Collegiate Student Loan Trust 2007-1 (collectively “NCSLT”).

3. I am the manager of TERI Loan Holdings. I have been in that role since 2012. In my role as manager of TERI Loan Holdings, I am responsible for managing and overseeing the collection of the company’s student loan portfolio. All facts set forth herein are based upon (i) my personal knowledge of TERI Loan Holdings operations; or (ii) information supplied to me by TERI Loan Holdings’ professionals and advisors.

4. If called to testify, I could and would testify to the facts set forth in this Declaration.

5. TERI was a non-profit entity that provided educational opportunities through its college outreach activities and student loan guarantee programs. TERI guaranteed certain student loans, some of which were placed into the NCSLT.

6. If a student loan held by the NCSLT defaulted, TERI would honor its guaranty by purchasing the defaulted loan from NCSLT.

7. On April 7, 2008 (the “Petition Date”), TERI filed a petition for relief under chapter 11 of the Bankruptcy Code in the Bankruptcy Court, commencing the case styled *In re The Education Resources Institute, Inc.* Case No. 08-12540.

8. As part of its Plan, TERI transferred the entirety of its portfolio of defaulted student loans to TERI Loan Holdings, including certain defaulted loans that TERI had purchased after the Petition Date.

9. Acting at my direction, the collection manager for TERI Loan Holdings has searched the portfolio database for all current and former borrowers with the following names: Sarah Thurlow (now Coffey), Vicki McMullen, Jane Forrester-Winne, and Karin Hills. There are no accounts in the database matching these names, nor is there any record of there ever having been.

10. Upon information and belief, neither TERI nor TERI Loan Holdings ever held any right, title, or interest in any student loans for Sarah Thurlow (now Coffey), Vicki McMullen, Jane Forrester-Winne, or Karin Hills.

11. Upon information and belief, the most recent NCSLT defaulted loan in the entire portfolio was acquired by TERI Loan Holdings in July, 2012.

Executed the 9 day of August, 2017.

By:


Eric A. W. Danner

SWORN TO AND SUBSCRIBED BEFORE ME

ON THIS 9 DAY OF August, 2017.


NOTARY PUBLIC

My Commission Expires: _____